

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY UNIVERSITY, GEORGETOWN UNIVERSITY, THE JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS INSTITUTE OF TECHNOLOGY, NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125

Hon. Matthew F. Kennelly

NOTICE OF FILING UNDER SEAL

Pursuant to Paragraph 10(b) of the Second Amended Confidentiality Order entered by the Court in the above-captioned litigation (ECF No. 608), Plaintiffs hereby serve notice of filing provisionally under seal Plaintiffs' Motion and Memorandum of Law In Support of Plaintiffs' Motion For Leave to Reopen the 30(b)(6) Deposition of Defendant MIT and to Compel MIT to Provide a Designee Knowledgeable About Certain Limited Topics, under the Second Amended Confidentiality Order.

A copy of the aforementioned filing is being served today upon counsel for all parties via email.

Pursuant to Paragraph 10(c) of the Second Amended Confidentiality Order, Plaintiffs reserve their rights to oppose any Motion to Seal filed by a producing party.

Dated: May 14, 2024

Respectfully Submitted,

/s/ Robert D. Gilbert

Robert D. Gilbert
Elpidio Villarreal
Robert S. Raymar
David Copeland
Steven Magnusson
Natasha Zaslove
GILBERT LITIGATORS & COUNSELORS,
P.C.
11 Broadway, Suite 615
New York, NY 10004
Tel: 646-448-5269
rgilbert@gilbertlitigators.com
pdvillarreal@gilbertlitigators.com
rraymar@gilbertlitigators.com
dcopeland@gilbertlitigators.com
smagnusson@gilbertlitigators.com
nzaslove@gilberlitigators.com

/s/ Edward J. Normand

Devin “Vel” Freedman
Edward J. Normand
Richard Cipolla
Joseph Delich
Peter Bach-y-Rita
FREEDMAN NORMAND FRIEDLAND LLP
99 Park Avenue
Suite 1910
New York, NY 10016
Tel: 646-350-0527
vel@fnf.law
tnormand@fnf.law
rcipolla@fnf.law
jdelich@fnf.law
pbachyrita@fnf.law

/s/ Ellen T. Noteware

Eric L. Cramer
Ellen T. Noteware
David Langer
Jeremy Gradwohl
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Tel: 215-875-3000
ecramer@bm.net
enoteware@bm.net
dlanger@bm.net
jgradwohl@bm.net

Ivy Ngo

FREEDMAN NORMAND FRIEDLAND LLP
1 SE 3d Avenue Suite 1240
Miami, FL 33131
Tel: 786-924-2900
ingo@fnf.law

Richard Schwartz
BERGER MONTAGUE PC
1720 W Division
Chicago, IL 60622
Tel: 773-257-0255
rschwartz@bm.net

Daniel J. Walker
Robert E. Litan
Hope Brinn
BERGER MONTAGUE PC
1001 G Street, NW Suite 400 East
Washington, DC 20001
Tel: 202-559-9745
dwalker@bm.net
rlitan@bm.net
hbrinn@bm.net

Counsel for Plaintiffs